



<p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</p> <p>Anthony O. Egbase, Esq. (SBN 181721) Shana Y. Stark, Esq. (SBN: 171555) A.O.E LAW &amp; ASSOCIATES A Professional Law Corporation 350 South Figueroa Street, Suite 189 Los Angeles, California 90071 Tel: (213) 620-7070; Fax: (213) 620-1200 Email: info@aoelaw.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Debtors and Debtors-in-Possession</p>		<p>FOR COURT USE ONLY</p>	
<p><b>UNITED STATES BANKRUPTCY COURT</b> <b>CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b></p>		<p></p>	
<p>In re:</p> <p>HAN SOK KIM and SEUNG HEE KIM</p>		<p>CASE NO.: 2:21-bk-12426-SK</p> <p>CHAPTER: 11 </p>	
<p>Debtor(s).</p>		<p><b>NOTICE OF SALE OF ESTATE PROPERTY</b></p>	

<b>Sale Date:</b> July 7, 2021	<b>Time:</b> 9:00 am
<b>Location:</b> Courtroom 1575 (Hon. Sandra R. Klein), 255 E. Temple Street, L.A., CA 90012	

**Type of Sale:** ☒ Public ☐ Private **Last date to file objections:** June 23, 2021

**Description of property to be sold:**

419 S. CITRUS AVENUE, LOS ANGELES, CA 90036

**Terms and conditions of sale:**

See attached Notice of Motion and Hearing. Sale price is \$2,080,000.00 subject to overbid by Qualified Bidders at the hearing. Initial overbid is at least \$2,090,000.00. Subsequent overbids are in increments of \$5,000.00. No contingencies.

**Proposed sale price:** \$2,080,000.00

**Overbid procedure (if any):**

Overbid packages must be received by July 5, 2021 at 9:00 a.m. including: (i) written offer of at least \$2,090,000.00, (ii) satisfactory proof of available funds in the highest amount bidder wishes to be qualified to bid, (iii) waiver of all contingencies and further due diligence. See Sale Motion for further details.

**If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:**

July 7, 2021 at 9:00 a.m.  
Courtroom 1575 (Hon. Sandra R. Klein)  
255 E. Temple Street, Los Angeles, CA 90012

**Contact person for potential bidders (include name, address, telephone, fax and/or email address):**

Anthony O. Egbase, Esq., Counsel for Debtors  
A.O.E. Law & Associates, APC  
350 S. Figueroa Street, Suite 189  
Los Angeles, CA 90071  
Tel: 213-620-7070; Fax: 213-620-1200  
Email: info@aoelaw.com

Date: 06/11/2021

Anthony O. Egbase, Esq. (SBN 181721)  
Shana Y. Stark, Esq. (SBN: 171555)  
**A.O.E LAW & ASSOCIATES**  
**A Professional Law Corporation**  
350 South Figueroa Street, Suite 189  
Los Angeles, California 90071  
Tel: (213) 620-7070; Fax: (213) 620-1200  
Email: info@aoelaw.com

Attorneys for Debtors and Debtors-in-Possession,  
Han Sok Kim and Seung Hee Kim

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

In re:

**HAN SOK KIM and SEUNG HEE KIM**

Debtors and Debtors-in-Possession.

Case No.: **2:21-bk-12426-SK**

Chapter 11

**NOTICE OF MOTION AND HEARING  
ON MOTION FOR ORDER:**

**(A) AUTHORIZING SALE OF REAL  
PROPERTY LOCATED AT 419 S.  
CITRUS AVENUE, LOS ANGELES, CA  
90036 FREE AND CLEAR OF CLAIMS,  
LIENS, ENCUMBRANCES, AND  
INTERESTS PURSUANT TO 11 U.S.C  
§363;**

**(B) APPROVING THE FORM AND  
MANNER OF NOTICE AND BID  
PROCESS;**

Date: July 7, 2021

Time: 9:00 a.m.

Ctrm: 1575

255 E. Temple St., Los Angeles, CA  
90012

Judge: Hon. Sandra R. Klein

**TO (A) DEBTORS, (B) THE OFFICE OF THE UNITED STATES TRUSTEE, (C)  
ALL SECURED CREDITORS OF THE ESTATE AND PERSONS HAVING FILED  
PROOFS OF CLAIM, (D) ALL PERSONS REQUESTING SPECIAL NOTICE, (E) ALL  
LIEN HOLDERS OF RECORD FOR THE CITRUS PROPERTY, (F) THE BUYER, AND**

**(G) OTHER PARTIES IN INTEREST, AND THEIR RESPECTIVE COUNSEL OF  
RECORD, IF ANY:**

**NOTICE IS HEREBY GIVEN** that on **July 7, 2021 on the 9:00 a.m. calendar**, in Courtroom 1575 of the United States Bankruptcy Court located at 255 E. Temple Street, Los Angeles, CA 90012, the Honorable Sandra R. Klein, United States Bankruptcy Judge presiding, will conduct a hearing on the *Motion for order: (A) Authorizing the Sale of Real Property Located at 419 S. Citrus Avenue, Los Angeles, CA 90036 Free And Clear Of Claims, Liens, Encumbrances, And Interests Pursuant To 11 U.S.C §363;(B) Approving The Form And Manner Of Notice And Bid Process; Memorandum Of Points And Authorities; Declaration Of Han Sok Kim And Seung Hee Kim; Paul Chung In Support Thereof; And Exhibits* (hereinafter “Motion”) filed by Han Sok Kim and Seung Hee Kim, Debtors and Debtors in Possession (hereinafter “Debtors”) in the above captioned bankruptcy case (hereinafter “Case”). Specifically, through this *Motion*, the Debtors respectfully shall move this Court for an entry of an order that does all of the following:

(1). Grants the *Motion* and enters an *Order* in substantially the form attached hereto as **Exhibit 15**.

(2). Approves the overbid process as set forth in the *Motion*.

(3). Approves the Purchase Agreement and Counter Offer by Debtors, as modified by the Sellers Counter Offer No. 1 and accepted by Hansuk Han as buyer, and attached to this *Motion* as **Exhibit 1**.

(4). Pursuant to Section 363(b) of the Bankruptcy code, authorizes, directs and empowers the Debtors to take any and all necessary actions and reasonable steps to consummate the sale of the Citrus Avenue Property to Hansuk Han, or to a successful overbidder, (in either case, as applicable, the “Buyer”), for at least **\$2,080,000.00** of the real property commonly known as **419 S. CITRUS AVENUE, LOS ANGELES, CA 90036** (hereinafter “Citrus Property”), APN; 5507-012-004, and legally described as:

Real Property in the City of Los Angeles, County of Los Angeles, State of California, described as follows:

LOT 93 OF TRACT NO. 5049, JN THE CITYOF LOS ANGELES,  
COUNTY OF LOS ANGELES. STATE OF CALIFORNIA,  
AS PER MAP RECORDED IN ROOK 54. PAGE 52 OF MAPS.  
IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

(5). Determines that adequate notice of hearing on the *Motion* was given and approves the overbid procedure described in the *Motion*

(6). Authorizing the payment through escrow all usual and customary costs of sale, including (a) a broker's commission of 6%, (b) escrow fees, (c) title insurance fees, (d) recording fees, (e) messenger fees; (f) liens of record in order of priority; (g) administrative fees to A.O.E. Law & Associates subject to Court approval; and to the extent of available funds, in each to the extent not disputed by the Debtors.

(7). Compelling all holders of liens and encumbrances, if any, to execute any and all documentation that may be required to allow escrow to close;

(8). Authorizing the payment through escrow, the undisputed amounts of: (i) the liens and any and all taxing authorities, (ii) the lien of Cenlar FSB as servicer for Ally Bank ("Ally Bank") in the approximate amount of \$519,482.41; (iii) the lien of Bank of America ("BofA") in the approximate amount of \$234,087.26; (iv) the lien of Pacific City Bank ("Pacific City") in the approximate amount of \$1,195,348.42;

(9). Determines that First General Bank ("First General") consents to the releasing of the fourth trust deed lien on the property located at 419 S. Citrus Avenue, Los Angeles, CA 90036 and authorizes the sale of the Citrus Property, directing the release of the fourth trust deed lien on the Citrus Property held by First General, and attached to this *Motion* as **Exhibit 16**.

(10). Determines that the Purchase Agreement and Seller's Counter Offer was entered into in good faith, in an arm's length transaction and that the Buyer is acting in good faith within the meaning of 11 U.S.C. §363(m).

1 (11). Determines that the terms and provisions of the *Order* on the *Motion* shall be binding  
2 in all respects upon the Buyer, the Debtors, the Estate, all creditors and interest holders of the  
3 Debtors and the Estate, all parties having received notice of the *Motion*, and all interested parties,  
4 and their respective successors and assigns, including, but not limited to any creditor asserting a  
5 lien, claim, or other interest in the Citrus Property.  
6

7 (12). Determines that a certified copy of the *Order* on the *Motion* may be filed with the  
8 appropriate clerk and/or recorded with the county recorder to evidence conclusively the release  
9 or cancellation of the claims, liens, and interests as set forth in that *Order*.

10 (13). Determines that the *Order* on the *Motion* may be presented to and shall be binding  
11 upon and govern the acts of all persons and entities, including, without limitation, all filing  
12 agents, filing officers, title agents, title companies, escrow agents, recorders of mortgages,  
13 recorders of deeds, registrars of deeds, administrative agencies, federal, state and local  
14 governmental agencies or departments, secretaries of state, federal and local officials, and all  
15 other persons and entities who may be required by operation of law, the duties of their office, or  
16 contract, to accept, file, register or otherwise record or release any documents or instruments, or  
17 who may be required to report or insure any title or state of title in or to any property; and directs  
18 each of the foregoing persons and entities to accept for filing any and all of the documents and  
19 instruments necessary and appropriate to consummate the transactions contemplated by the  
20 Purchase Agreement and Counter Offer accepted by the Buyer.  
21  
22

23 (14). Authorizes the title company insuring the Debtors' sale of the Citrus Property and the  
24 escrow agent for such sale, to be entitled to rely upon the *Order* on the *Motion* in connection  
25 with the sale.

26 (15). Determines that the fourteen (14) day stay period set forth in Federal Rule of  
27 Bankruptcy Procedure 6004(h) is waived; and notwithstanding Federal Rule of Bankruptcy  
28

1 Procedure 6004(h), the *Order* on the *Motion* shall be immediately effective and enforceable upon  
2 its entry and there shall be no stay of the *Order* on the *Motion*.

3 (16). Granting such other and further relief as the Court deems just and proper under the  
4 circumstances.

5 **NOTICE IF FURTHER GIVEN** that the *Motion* is made pursuant to to 11 U.S.C.  
6 §§ 363(b) and 363(m), Federal Rules of Bankruptcy Procedure 2002 and 6004, and Local  
7 Bankruptcy Rules 6004-1 and 9013-1 on the grounds that the proposed sale of the Citrus  
8 Property is in the best interests of the Estate in that the sale will maximize the value of the Citrus  
9 Property for the benefit of the Estate's creditors.  
10

11 **NOTICE IS FURTHER GIVEN** that the *Motion* is based upon (a) this *Notice of Motion*  
12 *and Hearing on Motion*; (b) the concurrently filed *Notice of Motion and Motion, Memorandum*  
13 *of Points and Authorities, Declarations of Han Sok Kim and Seung Hee Kim, Paul Chung and*  
14 *Exhibits*; (c) the pleadings on file with the Court of which the Court is requested to take judicial  
15 notice; and (d) such further evidence that may be properly submitted prior to or at the hearing on  
16 the *Motion*. At your own expense, you may obtain a complete copy of the *Motion* from the  
17 Court's file. You may also obtain a free, electronic copy of the *Motion* by requesting such copy  
18 from Debtors' counsel, whose contact information is: A.O.E. Law & Associates, APC, Attn:  
19 Anthony O. Egbase, Esq., email: [info@aoelaw.com](mailto:info@aoelaw.com), tel: 213-620-7070, 350 S. Figueroa Street,  
20 Suite 189, Los Angeles, CA 90071.  
21

22 **NOTICE IS FURTHER GIVEN that, pursuant to Local Bankruptcy Rule 9013-1(f),**  
23 **any opposition to the Motion must be in writing; must be filed with the Court and served**  
24 **upon the Office of the United States Trustee, the Debtors and the Debtors' attorney of**  
25 **record at the addresses set forth below not later than 14 days before the hearing on the**  
26 **Motion; and must include a complete written statement of all reasons in opposition thereto**  
27  
28

**or in support or joinder thereof, declarations and copies of all photographs and  
documentary evidence on which the responding party intends to rely, and any responding  
memorandum of points and authorities:**

**For Filing with the Court:**

Clerk's Office  
United States Bankruptcy Court  
255 E. Temple Street  
Los Angeles, CA 90012

**For Service on the U.S.Trustee**

Office of the U.S. Trustee  
915 Wilshire Blvd., Suite 1850  
Los Angeles, CA 90017

**For Service on the Debtors:**

Han Sok Kim and Seung Hee Kim  
419 S. Citrus Avenue  
Los Angeles, CA 90036

**For Service on Debtors' Attorney**

Anthony O. Egbase  
A.O.E. Law & Associates, APC  
350 S. Figueora St., Ste. #189  
Los Angeles, CA 90071

**NOTICE IS FURTHER GIVEN that, pursuant to Local Bankruptcy Rule 9013-1(h),  
failure to timely file and serve an objection may be deemed by the Court to be consent to  
granting the relief requested in the *Motion*.**

**WHEREFORE,** the Debtors respectfully requests the Court to grant the *Motion* and such  
other and further relief as the Court deems just and proper under the circumstances.

Dated: June 10, 2021

A.O.E. Law & Associates, APC

By: /s/ Anthony O. Egbase

Anthony O. Egbase  
Attorney for Debtors  
Han Sok Kim and Seung Hee Kim



In re: <b>Han Sok Kim and Seung Hee Kim</b>	Debtor(s).	CHAPTER: <b>11</b> CASE NUMBER: <b>2:21-bk-12426-SK</b>
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
**350 S. Figueroa St., Suite #189**  
**Los Angeles, CA 90071**

A true and correct copy of the foregoing document entitled (*specify*): ***NOTICE OF SALE OF ESTATE PROPERTY*** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **06/11/2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Ryan J DeRose on behalf of Interested Party Courtesy NEF  
[ryan@parkandlim.com](mailto:ryan@parkandlim.com), [cathy@parkandlim.com](mailto:cathy@parkandlim.com)

Anthony Obehi Egbase on behalf of Debtor Han Sok Kim  
[info@aoelaw.com](mailto:info@aoelaw.com), [sandy@ecf.inforuptcy.com](mailto:sandy@ecf.inforuptcy.com); [egbasear54561@notify.bestcase.com](mailto:egbasear54561@notify.bestcase.com)

Anthony Obehi Egbase on behalf of Joint Debtor Seung Hee Kim  
[info@aoelaw.com](mailto:info@aoelaw.com), [sandy@ecf.inforuptcy.com](mailto:sandy@ecf.inforuptcy.com); [egbasear54561@notify.bestcase.com](mailto:egbasear54561@notify.bestcase.com)

Lee S Raphael on behalf of Interested Party Courtesy NEF  
[ecfcca@ecf.courtdrive.com](mailto:ecfcca@ecf.courtdrive.com), [ecfcca@ecf.courtdrive.com](mailto:ecfcca@ecf.courtdrive.com)

Ron Maroko on behalf of U.S. Trustee United States Trustee (LA)  
[ron.maroko@usdoj.gov](mailto:ron.maroko@usdoj.gov)

United States Trustee (LA)  
[ustpreion16.la.ecf@usdoj.gov](mailto:ustpreion16.la.ecf@usdoj.gov)

Todd S Garan on behalf of Interested Party Courtesy NEF  
[ch11ecf@aldridgepите.com](mailto:ch11ecf@aldridgepите.com), [TSG@ecf.inforuptcy.com](mailto:TSG@ecf.inforuptcy.com); [tgaran@aldridgepите.com](mailto:tgaran@aldridgepите.com)

Bonni S Mantovani on behalf of Creditor Cenlar, FSB as servicer for Ally Bank  
[ecfcca@ecf.courtdrive.com](mailto:ecfcca@ecf.courtdrive.com), [bmantovani@pralc.com](mailto:bmantovani@pralc.com)

☐ Service information continued on attached page

In re:	<b>Han Sok Kim and Seung Hee Kim</b>	Debtor(s).	CHAPTER 11 CASE NUMBER 2:21-bk-12426-SK
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**2. SERVED BY UNITED STATES MAIL:**

On 06/11/2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**Debtors, Secured Creditors, Twenty Largest Unsecured Creditors and ALL Interested Parties**

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**Judge Copy via Personal Delivery:**

**Hon. Sandra R. Klein  
United States Bankruptcy Court  
255 E. Temple Street, Suite 1582  
Los Angeles, CA 90012**

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

06/11/2021

Date

Jose Flores

Printed Name

/s/ Jose Flores

Signature

Label Matrix for local noticing

0973-2

Case 2:21-bk-12426-SK

Central District of California

Los Angeles

Thu Apr 1 11:54:03 PDT 2021

Bank of America, N.A.

P.O. BOX 15284

Wilmington, DE 19850-5284

Los Angeles Division

255 East Temple Street,

Los Angeles, CA 90012-3332

Bank of America, N.A.

P.O. Box 31785

Tampa, FL 33631-3785

Ally Mortgage

P.O. Box 77404

Ewing, NJ 08628-6404

Chase Auto

P.O. Box 901076

Fort Worth, TX 76101-2076

Costco

P.O. BOX 790046

Saint Louis, MO 63179-0046

Directv, LLC

by American InfoSource as agent

PO Box 5072

Carol Stream, IL 60197-5072

Franchise Tax Board Bankruptcy

Section, MS: A-340

P.O. Box 2952

Sacramento, CA 95812-2952

Internal Revenue Service

P.O. Box 7346

Philadelphia, PA 19101-7346

Lakehaven Water &amp; Sewer District

31627 First Avenue South

Federal Way, WA 98003-5201

Pacific City Bank

3701 Wilshire Blvd, Suite 900

Los Angeles, CA 90010-2871

United States Attorney's Office

Federal Building, Room 7516

300 North Los Angeles

Los Angeles, CA 90012-3336

United States Department of Justice

Ben Franklin Station

P.O. Box 683

Washington, DC 20044-0683

United States Trustee (LA)

915 Wilshire Blvd, Suite 1850

Los Angeles, CA 90017-3560

Anthony Obehi Egbase

A.O.E Law &amp; Associates, APC

350 S Figueroa St Ste 189

Los Angeles, CA 90071-1117

Han Sok Kim

419 S. Citrus Avenue

Los Angeles, CA 90036-3536

Seung Hee Kim

419 S. Citrus Avenue

Los Angeles, CA 90036-3536

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Courtesy NEF

End of Label Matrix

Mailable recipients 17

Bypassed recipients 1

Total 18